

EXHIBIT A

1. Deponent's *curriculum vitae* and bibliography.
2. All records, including medical and prescription records, for **Lirlene Gardley-Starks** in deponent's possession.
3. Any and all educational materials, counseling materials, handouts, or consent forms in deponent's possession regarding Reglan and/or metoclopramide.
4. All literature from Wyeth or any other drug manufacturer regarding Reglan and/or metoclopramide within your possession.
5. Any and all materials in deponent's possession provided by counsel for **Pfizer, Inc., Wyeth LLC and/or ESI Lederle, Inc.**, including, but not limited to, documents, correspondence, statements, transcripts, and records.
6. Any other documents relating to this action, including notes, correspondence, literature (whether medical or otherwise), and research that deponent has written, reviewed, considered or prepared in connection with this litigation.
7. All reports, draft reports, iterations of reports, inserts to reports, red-lined versions of reports, and/or modifications or supplements to reports prepared by or provided to the deponent regarding his testimony in this litigation.
8. Any and all publications written by, quoting, or otherwise mentioning the deponent that are relevant to the issues in this litigation.
9. Copies of any articles, texts, treatises, or other publications authored in whole or in part by the deponent which relate to or bear on the issues involved in this case.
10. Copies of any articles, texts, treatises, or other publications established, or to be established, as a reliable authority by the testimony of the deponent.
11. Copies of any articles, texts, treatises, or other publications on which the deponent has been or will be asked to express an opinion concerning authority, reliability, or agreement with any statement in the work.
12. Copies of any articles, texts, treatises, or other publications reviewed by the deponent in connection with her work in this case.
13. Copies of any articles, texts, treatises, or other publications relied on by the deponent to any degree for the opinions she has formed in connection with this case.
14. All bills in your possession that relate to **Pfizer, Inc., Wyeth LLC and/or ESI Lederle, Inc.**.

15. Any and all documents relating to compensation for the deponent's study or testimony relating to this litigation. This includes any documents that reflect time spent reviewing this matter, including invoices, tax records (including Form 1099s), and time records.
16. Any and all documents relating to any facts or data provided by counsel for **Pfizer, Inc., Wyeth LLC and/or ESI Lederle, Inc.** that the deponent considered in forming any opinions to be expressed.
17. Any and all documents relating to assumptions that counsel for **Pfizer, Inc., Wyeth LLC and/or ESI Lederle, Inc.** provided to the deponent and that the deponent relied on in forming any opinions to be expressed.
18. Any and all documents reflecting time related to consulting or involvement in any other litigation relating to Reglan and/or metoclopramide. This includes invoices, tax records (including Form 1099s), and time records.
19. Any and all documents constituting or concerning the deponent's involvement with or participation on any FDA Advisory Committees.